

Exhibit F

Alana M. Suarez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
ALANA M. SUAREZ

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF CONNECTICUT)
 : SS.:
COUNTY OF FAIRFIELD)

ALANA M. SUAREZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 237 Brewster Street, 1st Floor, Bridgeport, Connecticut 06605.

2. I am currently 26 years old, having been born on August 14, 1995.

3. I am the daughter of John Joseph Hough, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from esophageal cancer on December 8, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 18 years old when my father passed away. My dad was very involved in my life every single day. When I was in the fifth grade, my dad retired, and I would see him as soon

as I alighted from the school bus. Since my dad was a little older than most fathers, he was around more often than other working parents would be. My parents weren't married, but we were definitely a close family. In fact, we would have dinner together every night. My mom and dad were truly the best of friends. Growing up, I would spend every other weekend at my dad's house, which brought us closer and allowed us to spend quality time alone together. Since I saw him during the week as well, my dad would take me to dance class, make dinner, help me with homework and all of the other usual things you do after a school day.

6. I was only 6 years old on 9/11. As such, I don't recall many specific details. Of course, I knew that my dad was an officer with the Suffolk County Police Department, and he spent a significant amount of time performing work at Ground Zero following the attacks.

7. Right before I left for college, my dad had developed a really bad cough and had scheduled some doctor appointments to get the cough checked out. Around June of 2013, my parents informed me that the results of several tests my dad had undergone revealed that he had cancer, which was already at a fairly advanced stage. I became very worried, but my parents informed me that my dad would fight as best as he could. From there, my dad would venture into the city once a week to go to Sloan Kettering for treatments. Since my mother was working, many times my father's friend would drive him to his treatments at Sloan. In addition to coughing, my dad had a very difficult time eating and keeping food down. Eventually, he required a feeding tube. By the time he passed away, my dad had lost a massive amount of weight.

8. In September 2013, I began my freshman year of college at Fairfield University. I was concerned about the progression of my dad's cancer. This made it especially hard for me to be away from home. I tried to focus on my studies during my first semester of college as best I

could. I returned home to visit my parents on Long Island in November for the Thanksgiving break. Unfortunately, it wasn't the most cheerful holiday because that night my dad had a lot of difficulty eating. He already had a feeding tube following his diagnosis, but by this time, eating and digestion became even more uncomfortable for him. By my next visit home, my father was placed in hospice. His cancer intensified so quickly that he passed away just a few weeks later, on December 8, 2013. It is sad to think that my dad had to spend the last few weeks of his life in the hospital rather than being home enjoying the holidays.

9. As a freshman, it was extremely difficult being away from home knowing my dad was still undergoing cancer treatments. However, I spoke to him on the phone every day and visited when I could. My parents did not keep me informed as to the extent of how far the cancer had progressed. They were worried that if I knew, I would be home all the time and lose focus on my studies.

10. It is impossible to overstate the emotional impact of my dad's cancer. I lost him during the transformative years of my life, which made things even tougher for me. The weeks leading up to my dad's death were very close to my first-ever week of finals in college. I had to quickly learn how to manage school with my personal family obligations. Fairfield was very supportive regarding the situation, but it was stressful for me to have to catch up and take the finals that I had missed due to my dad's funeral.

11. It was extremely difficult to go through a parent's death at such a young age, especially when my dad's illness seemed to come out of nowhere and progress as rapidly as it did. It was also hard to be away from home and feel conflicted as to where the most appropriate place for me to be truly was. This has caused me a lot of guilt. I knew my parents wanted me to be at school, but at the time, I wished I could have been home to provide more support to my

dad. Sometimes I wonder whether I made the right decision.

12. Once my dad was diagnosed, there were a number of financial and technical pressures that emerged in my life as well. My tuition had to be paid on a timely basis, and my dad was supposed to sign off on the checks. This was difficult, however, since he wasn't even awake most of the day. More critically, my dad was the person who contributed most to the account that we had planned to use to pay for my tuition. Since I didn't qualify for financial aid, it became very stressful to figure out how to pay for tuition going forward. I also worried greatly about my mom, who was largely alone during the nightmare of my dad's health problems and was still grieving when I returned to college.

13. Losing my dad at such a young age was particularly painful. He wasn't there to see my graduation and has missed so many other monumental moments in my life since then, including making the dance team at college, graduating Fairfield with a Master's Degree, and landing my first job. I'm saddened that when I start dancing again, my dad won't be able to be there. He'll also never get to walk me down the aisle at my future wedding.

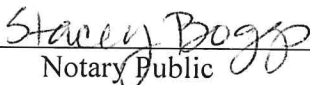
14. After my dad passed away, my mom and I had to think about a number of financial changes we would need to make. In addition to the difficulties with tuition, in February 2014, my mom had to sell our house and move into a condo, where she is still living today. She essentially decided to downsize and lessen expenses. That was a clear toll on us financially.

15. My dad was always quite healthy. He ate well and exercised regularly. Before his illness, he would go to the gym every day, and we would often go together. Many of the healthy eating habits I now have, I picked up from my dad. As a result, I know that had it not been for

his exposure to the 9/11 toxins, my dad would never have come down with esophageal cancer.


ALANA M. SUAREZ

Sworn to before me this
31 day of May, 2022

 5/31/2022
Notary Public

Thomas Humphrey

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
THOMAS HUMPHREY

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

THOMAS HUMPHREY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2699 Ocean Avenue, Seaford, New York 11783.

2. I am currently 75 years old, having been born on February 22, 1947.

3. I am the husband of Nancy Alicia Humphrey, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from bile duct cancer on August 28, 2015. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Nancy and I were soulmates. She was a beautiful person, inside and out. There aren't enough good things I can say about her. She was sensitive, funny, and smart. She possessed every quality I could ever want in a woman, and I truly loved her. Nancy and I enjoyed socializing with friends and family. We attended business events, enjoyed dinner-dancing, and the list goes on and on. We simply loved being together.

6. Nancy was the Senior Director of Marketing at Fitch Ratings, a bond rating company near Ground Zero. On 9/11, she was on the 33rd floor of her building and saw the second plane hit the South Tower. I was so relieved when I was finally able to reach my wife and know that she was safe. Traumatized, but safe. Nancy was running for her life towards the Brooklyn Bridge when the second tower collapsed. She met me at my office in Long Island City, and we drove home together. Her company was closed for the remainder of that week. The following Monday, however, she got called to return to work since the EPA had determined that the air quality was safe. She continued in the same job, at the same location, for quite some time thereafter.

7. In November of 2014, Nancy developed a pain in her abdomen. She was diagnosed with bile duct cancer. She only lived for nine months after her diagnosis. The doctor said the cancer likely started a year earlier, but by the time symptoms present themselves, the cancer is usually too far advanced to treat. Prior to her diagnosis, Nancy took very good care of herself. She always ate a healthy diet. But it didn't matter in the end.

8. There weren't many treatment options available to Nancy. She had chemotherapy, which was very rough on her. She had many bad days. I took her home and set up home hospice care for her. Nancy was on so many medications when she died. She was a real trooper through it all. If visitors came, she would do the best to put on a good front. Her dignity was important to her.

9. I took care of my wife from the time of her diagnosis until her death. Twenty-four hours a day, seven days a week. I bought a special hospital bed for the house. I administered her medication and vitamins. I made sure her IV was correctly attached and that she was getting the right dosage of medication. A nurse's aide would come each day, so I could go out and get some food. Aside from those few minutes, I was always with her. All I wanted was to make her comfortable. I would do it again for her in a heartbeat. It was heartbreaking for me to see my wife suffer the way she did.

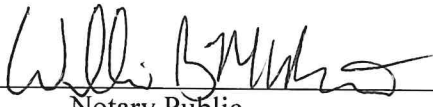
10. After Nancy passed away, I joined a bereavement group, which has been helpful throughout the years. I joined the American Legion to stay busy. Life is lonely now, but I try to make the best of it. All of the plans Nancy and I had for our retirement years were ripped out from under us. Just like that. We were going to sell the house, get a place in Long Beach, do

some traveling, and see the grandkids more often. We were always so in sync with each other. She truly was my perfect person. I will never get over the pain of losing her much too soon.



THOMAS HUMPHREY

Sworn to before me this
25 day of May, 2022



Notary Public
WILLIAM B. McBRIDE
Notary Public, State of New York
No. 01MC6077085
Qualified in Suffolk County
Commission Expires 7/01/2022

Shawna J. Jones

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X

JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
SHAWNA J. JONES**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

SHAWNA J. JONES, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3921 Wilder Avenue, Bronx, New York 10466.

2. I am currently 49 years old, having been born on April 9, 1973.

3. I am the daughter of Marion Claire Jones, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from lung cancer on September 23, 2013. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My mother and I lived together and shared a very close relationship. Before her lung cancer diagnosis, she had some non-9/11 medical problems, and I was her main caregiver.

These resulted from a horrible fall she had prior to 9/11, which led to an unfortunate cycle of surgeries and recovery. Unfortunately, she only had about two years of “freedom,” where she was feeling good and somewhat healthy, before receiving her cancer diagnosis.

6. On September 11, 2001, my mother was in a building directly across the street from the World Trade Center towers. She worked as a chef at a law firm cafeteria, and also provided catered meals for business meetings at the firm. She was on the 38th floor of her building when the planes hit. She was close enough to see the people who worked in the buildings and see what they were doing. When the first plane went into the building, she didn’t comprehend what was happening. She saw people hanging onto the ledges outside the towers and blowing away like pieces of paper. Then she heard the loud “bang” of peoples’ bodies hitting the pavement. She said they splattered like water balloons. She watched helplessly as she could see the people in the buildings struggling to decide whether they were going to burn to death or jump. It completely traumatized her. She was evacuated from her building just before the first tower collapsed. Someone pulled her to safety, but she was breathing in the remains of the collapsed buildings from the very beginning. Hours passed before she was able to leave the area and get far enough away to catch a bus home.

7. My mother was surprised how quickly she was told to return to work. She felt like workers were being used by politicians as pawns to show the world that “New York City is fine.” As soon as she went back to work, she was affected by the air. She went to the doctor, and he noticed a change in her breathing. He told her to get an N-95 mask and make sure she wore it whenever she was downtown. She bought herself a mask and wore it every day to work. Her company tried to get her to remove it at work, but she refused. Many of her co-workers were also

starting to experience shortness of breath, and were envious that my mother had a mask to wear. My mother continued working in that area until about June 2003.

8. In 2012, close to Christmas, my mother was in bed, saying, "Oh my God. I can't breathe. I think I'm having a heart attack." She wasn't able to sit up. We went to the hospital and she was diagnosed with a broken rib. We thought that was strange. The doctor had a feeling that there might be something more serious going on. She was admitted to the hospital for a few days. She called me and said they think it might be cancer. I was absolutely shocked. The doctors went over her medical history, ran some further diagnostic tests, and she was released to go home. A few days later, it was confirmed that she had lung cancer. The location of the tumor was what caused her rib to break. She underwent surgery to remove the tumor, followed by 4 or 5 months of chemotherapy, 3 times a week, 5-hour sessions each. During that time, it was really tough to make ends meet. We had to sacrifice a lot, and often go without, but I'm very resourceful. We managed to make it work.

9. As a result of the chemo, my mother lost her hair and her voice. She also lost a lot of weight. My mother was almost 70-years old at the time, but suddenly she looked a lot older than that. Friends couldn't recognize her. Her veins were so shot from all the IV medication, they had to put a port in her neck. It was heartbreaking for me to see her go through all of this.


10. Initially, the doctors believed that the treatment had worked and that she was cancer free. That didn't last long. A couple of weeks later, he told us that the cancer was back full-blown. I was devastated. I told the doctor I wanted him to do everything possible to keep her alive since we weren't sure how much time she had left. You hear of people being told they have days or weeks to live, and they actually live for months or even years. I wanted her to have that chance. Emotionally, I was trying to brace myself for when the time came that I'd be living

without her. I think I became a little distant from her, and she noticed the change. But it was only me trying to cope with that fact that I wouldn't have her much longer.

11. The doctors tried as best they could, but after the chemotherapy, there weren't many options. There was talk about my mother participating in a drug trial for a new cancer pill, but she was too far gone. By mid-August 2013, her decline accelerated. She couldn't eat and kept rolling over and falling out of bed. I had to puree her food so she would at least have some sustenance. At the end, she was in so much pain that I would hear her moaning. She was in and out of the hospital. She suffered mini-strokes and wasn't always lucid. She didn't understand what was happening to her, but she knew she was dying. The last time she was home, she had a full-on seizure. We went back to the hospital. She died in my arms. My heart truly goes out to the families who lost people on the day of 9/11, but watching a loved-one slowly deteriorate and die, is not any easier. There is no "better" or "easier" way to lose someone. Our loved ones were affected over a long period of time, and that should be taken in consideration.


SHAWNA J. JONES

Sworn to before me this
25 day of May, 2022


Notary Public

Roxanne C. Brown
Notary Public, State of New York
No. 01BR6269354
Qualified in Bronx County
Commission Expires Sept. 24, 2024

Revell Joseph Montgomery

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

-----X
JOANNE T. ALCABES, et al,

**AFFIDAVIT OF
REVELL JOSEPH MONTGOMERY**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF BRONX)

REVELL JOSEPH MONTGOMERY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3921 Wilder Avenue, Bronx, New York 10466.
2. I am currently 61 years old, having been born on January 16, 1961.
3. I am the son of Marion Claire Jones, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My mom passed away from lung cancer on September 23, 2013. It was medically determined that her illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.
5. When she was younger, my mother was very athletic and outgoing, outspoken. She liked a good time, enjoyed a good party. My mother, my sister and I all lived together. All

three of us were solid as a rock. My mother had a very keen, sharp sense of wit. I loved that about her. I saw mother every morning and evening. My sister stayed home and took care of her, but with me having a full-time job, I would see when I wasn't working. We just understood each other and knew what the other was thinking. She knew I was always on hand for her. I'd do anything for her.

6. My mom worked at 1 Liberty Plaza, right across the street from The World Trade Center. She was always telling us about what she saw that day, how she saw the plane go into the building. Her building was rocking after the plane hit. I used to try and drive her to work every morning at 5am, so she wouldn't have to take the train. Mom used to go to work every single day. I was working as a truck driver and was on my way to Connecticut when I heard about the planes crash on the radio. I turned around to get her and take her home. But the area was blocked off, and I couldn't get anywhere near there. It took her all day to get back home. I remember her coming home with the dust on her face.

7. I was with my mother while they were diagnosing her in the oncology building. They said there was going to be a point where there's nothing they could do for her. I was standing there feeling terrible and trying to absorb the fact that my mother was actually going to leave us because of this. I'm a quiet person and didn't really say much to my mother. I do a lot of thinking, and I was remembering the things my mother used to do for me as a child, how she used to hold me and rock me back and forth. My sister, Shawna was the one who dealt directly with the doctors. I was trying to make sure I was working and that I didn't get fired from my job so I could pay the bills.

8. Through the chemotherapy, I saw a very energetic mom turn into a very tired mom. You could see it in her face, you hear it in her speak. I could see what the chemicals were doing to her, and I was devastated watching this. Even with everything she had gone through, this was different. You could see the tiredness and you can see the pain and how spirited she had been and now she couldn't do what she used to do. She used to cook, she'd go out there and play games. She'd go out and play paddleball. She was a very active person, but all of that was drained out of her after 9/11. I was the one who helped her take her pills. When it got to a point where she didn't want to take them anymore because they were too big for her, I would crush

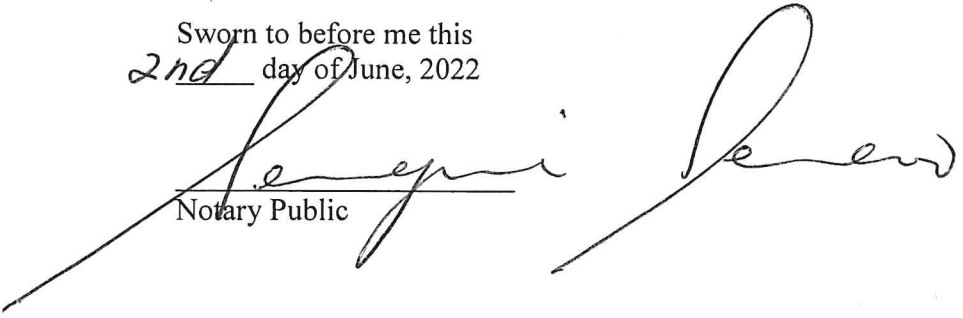
them up and give her little bits of each pill at a time. She really started to decline when she was on so much of this medication.

9. It broke me down to take away the only person that I had. Her illness and death had a lot of impact on me emotionally, like it does right now, but at least I don't have to see her in pain. If it wasn't for her lung cancer, she would still be here. Even though she's now been gone for many years, it still hurts. The emotional impact is never going to go away. It's hard to try and keep on going and try to smile so people will think everything is ok, but it's not. My mom can't be replaced. I'm just looking for solace and justice for her.

10. I was at the hospital the day of her passing, but I went home to get something. Before I could get back to the hospital, my sister called me and told me that she had passed on. I wasn't gone for more than 30 minutes, and when I came back and saw her laying in my sister's arms, it hurt me so much that she was gone. I didn't know how to take that. All these years later, I still can't take it. I can't look at old pictures of her anymore because its going to break me down.


REVELL JOSEPH MONTGOMERY

Sworn to before me this
2nd day of June, 2022


Notary Public

SAROJOINIE SAMAROO
Notary Public, State of New York
No. 01SA6192231
Qualified in Bronx County
Commission Expires 12/16/2024

Lisa Ann Jaworowski

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

AFFIDAVIT OF
LISA ANN JAWOROWSKI

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

LISA ANN JAWOROWSKI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 20 Laurel Avenue, Unit # 68, East Islip, New York 11730.

2. My current age is 66, having been born on September 23, 1955.

3. I am the sister of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Johnny was my little brother by six years. As adults, both our families lived on Long Island, in New York. He was my daughter's godfather. My husband and I are godparents to John's daughter. We'd get together for backyard barbeques, birthdays, fireworks on the fourth of July, Macy's parade at Thanksgiving. Being a New York City police officer, John made sure we had great views.

6. On September 11, 2001, I called John when I saw the first plane hit the tower. He wasn't on duty that day. When the second tower was hit, he called to say he was going downtown. He was fairly private. I think he kept a lot inside about what he saw. He was always that way, especially with me and my mom. If he didn't want to talk about something, we let it be. John continued working at Ground Zero and the Staten Island landfill for months. Every year, September 11 is a day of remembrance and reflection for our family and so many others.

7. Our families were together on Labor Day weekend, 2011. The 10-year anniversary was approaching. That weekend, John mentioned that he had gone for a routine check-up to the gastroenterologist and the doctor wanted him to have follow-up tests. That's all John told us. John's colonoscopy revealed a large mass that went from John's esophagus to his stomach. The follow-up tests confirmed the mass was cancerous. Initially, the cancer appeared to be confined to his esophagus. John started radiation treatments right after he was diagnosed. The tumor shrank, and John decided to have surgery to remove the tumor. This was in early 2012. He recovered very well from the surgery. He had a scan, and we were told there was no evidence of cancer. "NEC" was written in the report.

8. Shortly after John recovered, the family was celebrating Easter at my house. John mentioned his stomach was bothering him. He jokingly said it was because of my cooking. In early May, he went back to the hospital for another scan. The results shocked everyone, including the doctors. Not only had the cancer returned, it had metastasized to his liver. Practically, his entire liver was cancerous. John was completely confident he would survive this, too. We were in the hospital, waiting for the doctor to plan John's next course of treatment. I remember this so clearly: A nurse came in and started talking about hospice care, that John's cancer was terminal. My mom and John's wife, Bernadette, ran out of the room. I was sitting with John on the hospital bed. John was weak, at this point, but he absolutely, 100 percent thought he was going to be able to beat this. For a second, I saw something in his eyes—that he knew, but he wouldn't allow himself to believe it. I was absolutely speechless. John successfully recovered from a very big surgery, only two months earlier. No evidence of cancer and suddenly he's terminally ill and we're setting up hospice care in the house.

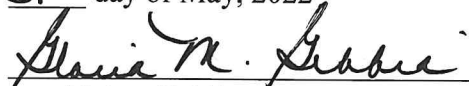
9. We took John home and the three of us, (mom, Bernadette and I) would try to be there as much as possible. John didn't like having us fuss over him. I'd go there and make these

little bracelets to keep myself busy and stay out of John's way. John kept insisting that he didn't need me to be there. But, the three of us were also supporting each other. We were going through this, too. To say it was devastating, doesn't even come close. We saw how sick he was, but John had us all convinced he was going to be fine. Whatever pain he was feeling, he did a good job of hiding it from us. It was like we were all pretending. I would see John wince in pain and convince myself it didn't happen. He looked awful, and nobody said anything about it. As he started getting weaker, he'd get frustrated that he couldn't do things for himself. I know he was in pain, and he wouldn't take the pain medication because he wanted to stay lucid.

10. This was my little brother. Just the thought of him being gone wasn't something I could comprehend. My father had died just six years before. Knowing my mother was going to lose her only son was unfathomable. The loss has such a ripple effect. I have six grandchildren of my own now. I think about the ones he never got to meet, and they never got to meet him. That doesn't end. Every milestone, everything that should be celebrated, I think about how much John would have loved to see it. If someone mentions September 11, there's a stab of grief. I don't think that dreadful feeling will ever go away.


LISA ANN JAWORSKI

Sworn to before me this
31st day of May, 2022


Notary Public

GLORIA M GEBBIA
NOTARY PUBLIC-STATE OF NEW YORK
No. 01GE5017046
Qualified in Suffolk County
My Commission Expires August 30, 2025

Ann Kristoffersen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOANNE T. ALCABES, et al.,

**AFFIDAVIT OF
ANN KRISTOFFERSEN**

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF SUFFOLK)

ANN KRISTOFFERSEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 17 Athens Court, West Babylon, New York 11704.

2. My current age is 87, having been born on October 7, 1934.

3. I am the mother of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My son passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My son John and I were close. John was my middle child and only son. My husband passed away six years before John, and after I was alone, my son and I became even closer. He would call me every day. From the time he was little, he always wanted to be a police officer. No one else in our family was in law enforcement, but that was always his dream. He loved being part of the New York City Police Department.

6. John started working on the clean up at Ground Zero the day after the attacks. He did it for quite a long time. We didn't see him, but he called us. We knew he spent time at the Staten Island landfill, but he said very little about what happened there. I couldn't image what he saw there day after day. He told me that if he could help bring closure to anyone, by locating a loved one, that's what he wanted to do. He was always thinking of others. John was always a generous and giving person.

7. I don't remember the exact time I found out that my son was ill. It was so upsetting and heart-wrenching, but from the beginning, John didn't act worried. He was very upbeat, no matter what treatment John had to endure. He always made it sound like he was going be fine. Until the very end, he would tell me not to worry. First, he had surgery at Sloan Kettering Memorial Cancer Center. We saw him right after the surgery, and he was so positive and optimistic. He was encouraging us to stay positive, as well. His optimism kept our worries at bay. He acted like it wasn't a big deal, he'd be fine and get through it. Prior to being diagnosed, he was perfectly healthy. We didn't notice any symptoms.

8. After the surgery, I went with him to several radiation treatments. Maybe it was because I was his mother that he hid things from me. John acted like everything was business as usual, routine. In that respect, I think John and his wife, Bernadette, both shielded me from knowing the severity of his illness. However, he was in home hospice very shortly after starting the treatments. Either, Bernadette, John's sister Lisa, or I was with John from the moment he came home. He was getting weaker and needed more attention. I was so difficult. I realized he wasn't going to get better and this was it. My husband was gone and soon my son would be gone.

9. Even at his worst, John was very strongminded. John wanted to be at home, and he refused to take any pain medication because he wanted to stay alert. He didn't want to rely on anyone. On his last day, it got to the point where he was only semi-conscious, and we knew he was in pain and he needed more help than the three of us could provide. Bernadette agreed to bring John to in-patient hospice care. We bought him there in the morning, and he passed away that night.

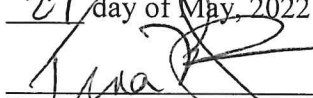
10. The entire experience was devastating for me. As I said, I had already lost my husband and when that happened, John stepped up and became the person I leaned on. No

matter how busy he was, he would call me to make sure I had everything I needed. He lived right around the corner from me, so that made it easier for him to take on the role of being the man of the house. Just knowing that he was close by and there for me if I needed him, was a tremendous comfort. Even something as small as a cable television bill that I didn't understand, I knew he'd take care of it, and he always did.

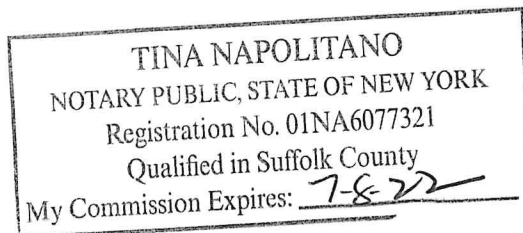
11. I feel terrible for his children. At my age, I've been blessed. I've seen my children get married, have grandkids, and seen them get married. Each time we have one of these wonderful occasions, there's something in my heart that breaks. For them not to have their father, feeling his absence instead of his presence, is so wrong and unfair.


ANN KRISTOFFERSEN

Sworn to before me this
27 day of May, 2022



Notary Public



Bernadette Kristoffersen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOANNE T. ALCABES, et al.,

Plaintiffs,

20-CV-00340 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

BERNADETTE KRISTOFFERSEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 931 Altessa Boulevard, Melville, New York 11747.

2. My current age is 63, having been born on August 2, 1958.

3. I am the wife of John Frank Kristoffersen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from esophageal cancer on August 25, 2012, at the age of 50. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. John was the love of my life and my everything. We met in 1984 when John was training at the New York City Police Academy. I was a waitress at a nearby restaurant that John frequented. His friends told me he hated the food and only went there to see me. We got married within a year and had been together ever since. My husband was very family-oriented and loved his children and me. We raised a beautiful son and a daughter together. He was a devoted husband and father. Our daughter had medical issues that demanded much of our attention. John

made sure that her illness didn't overshadow our son's life. John spent equal time with both kids. That was very important to him.

6. John was a homicide detective for the NYPD on 9/11 but had that day off. When he saw what had happened, he went to Ground Zero the next day. He was part of the rescue and recovery effort, sifting through the debris, bringing bodies to the morgue, and going to the Staten Island landfill to dispose of the rubble. He spent weeks working down at Ground Zero and months working at the landfill.

7. Before John's 50th birthday, he went for an endoscopy, which revealed a large mass. We were referred to go to Sloan Kettering, where John was diagnosed with esophageal cancer. John was a strong man who felt he could tackle anything that came his way. He wanted to start treatment and move on with his life. The first step was radiation to shrink the tumor. The radiation worked, and doctors felt that most of the tumor could be removed surgically. The surgery was intricate and invasive as they had to cut out the top of his stomach and the bottom of his esophagus and pull the stomach up to join the esophagus, which made his stomach very small. It was an extremely difficult recovery, but John was a model patient. The doctors were very optimistic and felt they had removed almost all of the tumor. They administered several rounds of chemotherapy. The doctor said John was cancer-free and sent us home.

8. At home, John followed a very strict diet since he had just undergone major surgery that left his stomach much smaller. He ate 6-8 small meals of pureed food per day. He was diligent about following orders because he was looking forward to returning to his job as a homicide detective. By March 2012, John's scan was clean and showed no sign of cancer.

9. The family got together on Easter Sunday, 2012. John said he didn't feel great because his stomach was bothering him. I thought maybe he had overeaten or had eaten something he couldn't easily digest. John was always the strong, silent type. If he didn't feel well, he'd keep it to himself. He was not one to complain if he had an ache or a pain. Shortly after that, I needed to go to Chicago to be with my daughter for a week. John's mother and sister looked after him in my absence.

10. When I returned home from Chicago, John looked terrible. His eyes were a dark yellow, and he had lost weight. I rushed him to our family doctor, who believed the cancer had spread to John's liver. He told us to get to Sloan immediately. There was something in the tone

of his voice that worried me, but I didn't say anything to John. I didn't want him to worry unnecessarily.

11. In May 2012, Sloan took performed new scans that revealed that the cancer had metastasized to John's liver. They said it had "exploded." No one expected these results. Still, John remained optimistic. Knowing that the cancer had returned and now spread, both the doctors and John agreed to an aggressive course of chemotherapy treatments. Unfortunately, it wasn't working. The doctor said the cancer came back with a vengeance. I was in John's hospital room when a nurse came in to talk to us about hospice care. When I heard her say the word "terminal," I abruptly told her to leave the room. I was adamant that John not know that his condition was that dire, so he didn't give up hope.

12. We never talked about the severity of the prognosis, the same way we didn't discuss what John had witnessed during his work at Ground Zero. It was our way of protecting one another. That's how our family was. John did his best to shield me and the kids from anything negative. We had all gotten used to not pushing him to talk. John knew that the cancer in his liver was serious, and he was angry. He was worried that he wouldn't have enough time to get his affairs in order to ensure the children and I were taken care of. It's all he cared about. I don't think that John believed he was dying. He was a fighter. He would do whatever it took to survive this. After hearing about an alternative-treatment clinic in Mexico that had some success with cancer patients, we decided to take a chance. The risk was that John needed to survive two months in order for the treatment to be effective. This treatment was not covered by insurance, and we had to pay \$30,000 out of pocket for it.

13. Within a few days of being Mexico, John was delusional and his system started shutting down. We were advised the toxins from all the medications he was given prior to coming to Mexico were building up in his body. They advised that they would have to flush out his system to try to remove the toxins. His system was flushed out and John received transfusions of healthy blood. They put him in a hyperbaric chamber in an effort to kill the cancer cells and activate his body's healing process. We were told that he should not take any medications for two months to allow the toxins to fully exit the body, which would allow the liver to start rejuvenating. Since there was nothing further they could do for him, the doctor suggested we arrange for a medical transport to fly us back home as soon as possible. They gave

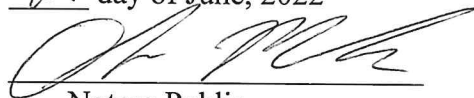
us vitamins and some enriched blood to be injected into John. They stabilized him enough for us to take a commercial flight back to the U.S. We were met on the tarmac by an NYPD ambulance and taken immediately back to Sloan Kettering. At this point, we knew the only option was hospice, but John wanted to be at home. I arranged for a hospital bed that we set up at home. Once he was home, I could hear him moaning in pain. It was awful. I was trying to feed him, but the food just fell out of his mouth. I kept telling him, "Come on John, you've got to hold on. All you need is two months." I tried to be his strength for him. I knew I had to withhold most medications so that the toxins had a chance to leave his body. It is our only hope of him getting through it. John tried to be so strong. He didn't want morphine or pain meds. He wanted to be alert. But, it was obvious he was in great pain. My heart broke for him. He was suffering, and he couldn't take care of himself. He became so frustrated with himself, his body, and his mind. He felt like he still had so much to do. He would try to remember things like the combination to our safe because he was the only one who knew these things. But he couldn't remember. He couldn't get his words out. This was a strong, proud man who now couldn't even stand without assistance. Just two days after we set up home hospice, John couldn't make it to the bathroom and had an accident. He cried. He kept saying how sorry he was. He always held the family together, and now he was falling apart. He needed assistance to do everything.

14. Part of me was still hoping John would live the two months needed for the toxins to exit his body. It was so difficult to see John in pain, or rather see him pretend not to be in pain and refuse to take medication. I could hear him moaning. I still held out hope that he could beat it. I know he was trying to hold on, but I realized that he needed more help than I could give him. After discussing it with the family, we decided to take John to the hospice facility. I learned that I was able to stay and sleep there with him. I believed I could take his enriched blood with me and administer it to him when needed, but I never got the opportunity. The hospice-care workers came to talk to me and told me that John had only hours left to live. He died the same night we brought him to hospice. We weren't prepared to lose him. John took care of everything for all of us. The whole thing was so unfair to him—to be told he was cancer-free and then die two months later! Maybe John knew he was dying and ultimately accepted his fate. I don't think he ever gave up, though. He was trying to be strong for his family to the very end.

15. Losing John completely destroyed my life. If not for my children and grandchild, I don't know how I would get through the day. I lost not only the love of my life, I lost my partner. I have no one. I no longer enjoy going to parties or weddings because John is not there to be with or dance with. I have no one to hold hands with or grow old with. John has a beautiful grandchild that he'll never meet. It breaks my heart because I know that he would have been the best, most loving grandfather. John and I had beautiful plans for our retirement that will never come to be. We dreamed of doing so many things together, including taking our grandchildren to Disney World, the same way we took our children when they were young. I miss everything about John. I think of him every minute of the day and wish he was still here. My life with never be the same without him. I can't imagine myself with anyone else. No one will ever compare to John. I will love him forever.


BERNADETTE KRISTOFFERSEN

Sworn to before me this
29 day of June, 2022


Notary Public

